

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHELLY STIVERS, on behalf of herself and
all other similarly situated persons, known
and unknown,

Plaintiff,

v.

ILLINOIS STATE TOLL HIGHWAY
AUTHORITY,

Defendant.

No. 15-cv-09030

Judge Matthew F. Kennelly
Magistrate Judge Maria Valdez

**PLAINTIFF’S AGREED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff, Shelly Stivers, individually and as representative of a Settlement Class of similarly situated persons, by counsel, Siegel & Dolan Ltd. respectfully requests that this Court preliminarily approve the parties’ class action settlement, as it meets all of the necessary requirements. In support of her agreed motion, Plaintiff submits a Memorandum of Law, and further states:

1. On behalf of herself and all other past and present similarly situated employees of the Illinois State Toll Highway Authority (“ISTHA”), Plaintiff filed a claim for unpaid overtime wages pursuant to the Illinois Minimum Wage Law, 820 Ill. Comp. Stat. 105/1, *et seq.* (“IMWL”), and the federal Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”).

2. As set forth in Plaintiff’s accompanying Memorandum of Law, the class settlement is fair, reasonable, and adequate.

3. Additionally, for the reasons outlined in Plaintiff's accompanying Memorandum of Law, the requested attorneys' fees and costs for counsel, as well as the requested service payment to the Named Plaintiff, are reasonable and warranted.

4. Attached as Exhibit 1 is Plaintiff's proposed "Order Granting Preliminary Approval of Class Settlement."

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant preliminary approval of this proposed settlement, sign the proposed order, and allow the Parties' proposed Notice and Claim Forms to be sent to the class members.

Dated: September 9, 2016

Respectfully submitted,

Bradley Manewith, #6280535
Marc J. Siegel, #6238100
Anne K. Schmidlin, #6313916
Siegel & Dolan Ltd.
150 North Wacker Drive, Suite 1100
Chicago, IL 60606
Tel. (312) 878-3210
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SHELLY STIVERS, on behalf of herself and all
other similarly situated persons, known and
unknown,

By: /s/ Bradley Manewith
Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he served a copy of the attached document, **Plaintiff's Agreed Motion for Preliminary Approval of Class Action Settlement**, to the individuals listed below by electronically filing the same with the Clerk of the U.S. District Court of the Northern District of Illinois on September 9, 2016:

William R. Pokorny
Sally J. Scott
Franczek Radelet P.C.
300 South Wacker Drive, Suite 3400
Chicago, IL 60606

/s/ Bradley Manewith
Attorney for Plaintiff